

IN THE MATTER OF AN APPLICATION TO
AN BORD PLEANÁLA

FOR APPROVAL OF (I) THE N6 GALWAY CITY RING ROAD
PURSUANT TO SECTION 51 OF THE ROADS ACT 1993 (AS
AMENDED); (II) THE N6 GALWAY CITY RING ROAD
MOTORWAY SCHEME 2018; and (III) THE N6 GALWAY CITY
RING ROAD PROTECTED ROAD SCHEME 2018

ABP Ref. ABP-302848-18 and ABP-302885-18

ORAL HEARING

STATEMENT of Evidence
Responses to Archaeology, Architectural & Cultural
Heritage
Objection/Submissions
by
Faith Bailey, MA, BA (Hons), MCifA, MIAI

20 February 2020

1 Qualifications and Experience

- 1.1 My name is Faith Bailey and I am a senior archaeologist and cultural heritage consultant employed by IAC Archaeology. I hold an MA in Cultural Landscape Management (archaeology and built heritage) and a BA in single honours archaeology from the University of Wales, Lampeter. I am a licence eligible archaeologist, a member of the Chartered Institute of Archaeologists, a member of the Institute of Archaeologists of Ireland and have over 16 years' experience working in the commercial archaeological and cultural heritage sector.

2 Role in Proposed Road Development

- 2.1 My role in the N6 Galway City Ring Road Project involved undertaking the archaeological, architectural and cultural heritage appraisal in respect of the proposed road development, from constraints and route selection through to environmental impact assessment for the EIAR. I have been working on the project since 2014 with responsibility for the following:

- co-ordinating our internal team and the production of information
- liaising with the environmental project managers (Arup) and wider environmental and design team
- liaising and consulting with the TII Project Archaeologist for the proposed road development
- Production of the archaeological, architectural and cultural heritage impact assessment of the proposed road development in Chapter 13 of the EIAR
- Compilation of Appendices A.13.1-A.13.12 of the EIAR

3 Key issues in relation to Archaeological, Architectural & Cultural Heritage

- 3.1 Chapter 13 of the EIAR is to be taken as read in its entirety and is not replicated here. To assist the Board in its consideration of this application for Approval and for the convenience of all participants at this hearing, the key items pertaining to the archaeological, architectural and cultural heritage assessment of the proposed N6 GCRR detailed in Chapter 13 of the EIAR are summarised briefly below.
- 3.2 The receiving environment is defined as an area measuring c. 250m from the edge of the proposed road development. Measurements are taken from the proposed development boundary to the upstanding remains of a site or structure. Where there are no upstanding remains, the measurement is taken to the centre of the site as indicated within Figures 13.1.01 to 13.1.15 of the EIAR.
- 3.3 41 Archaeological Heritage sites (AH) are recorded within this receiving environment. The existing Sites and Monuments Record (SMR) and Record of

Monuments and Places (RMP) is currently under review and a number of changes relating to some sites have been proposed in the Record by the Department of Culture, Heritage and the Gaeltacht (DoCHG). As such, five redundant records are included within the 41 sites, which will be removed from the SMR. These sites have been classed by the DoCHG as being non-archaeological. A potential profound negative impact is predicted during construction at one AH site, which consists of the site of an unlocated bullaun stone: AH 2 (ref. Figure 13.1.05 of the EIAR).

- 3.4 27 Protected Structures (BH sites), as listed in the Galway City Development Plan (2017-2022), are recorded within the receiving environment of the proposed road development. Six of the protected structures are also listed within the National Inventory of Architectural Heritage (NIAH). A further seven structures are listed solely within the NIAH survey. A profound negative impact is predicted during construction at one BH site, which consists of a thatched cottage: BH 12 (ref. Figure 13.1.09 of the EIAR).
- 3.5 Potential significant impacts arising on the archaeological, architectural and cultural heritage resource at operation stage are detailed in Section 13.5.4 of Chapter 13 of the EIAR. In summary potentially, significant negative impacts are predicted at two AH and BH sites. These consist of Menlo Castle (AH 16/ BH 10 – ref. Figure 13.1.07 of the EIAR) and a former Summer House in Dangan (AH 15/ BH 9 – ref. Figure 13.1.07 of the EIAR).
- 3.6 A total of nine designed landscapes have been identified within the receiving environment of the proposed road development. Of these, four are associated with a principal structure (Bearna House, Ragoon House, Bushypark House, Menlo Castle) that is listed as protected within the Galway City Development Plan (2017-2022). The landscapes are shown as shaded ‘demesne’ landscapes on the first edition OS mapping. A potential significant negative impact is predicted within one designed landscape at construction stage, which is associated with Menlo Castle: DL 8 (ref. Figure 13.1.07 of the EIAR).
- 3.7 72 sites of potential Cultural Heritage significance (CH sites) were identified during the course of the assessment within the receiving environment of the proposed road development. These vary in form and type and include the site of ruined, derelict or intact vernacular structures and potential sites identified during the preparation of the 2006 EIS for the N6 Galway City Outer Bypass. A total of 12 significant negative impacts are predicted at construction stage on CH sites 2, 18, 26, 29, 34, 38, 49, 52, 55, 56, 57 and 58 (ref. Figures 13.1.01, 13.1.03, 13.1.04, 13.1.05, 13.1.06, 13.1.07, 13.1.08, 13.1.10, 13.1.11 and 13.1.12 of the EIAR). These consist of the site of former vernacular buildings, vernacular cottages, a possible mass path and possible square enclosure.
- 3.8 12 Areas of Archaeological Potential (AAP sites) have been identified during the course of the assessment, which consists of watercourses and aspects of the natural landscape that may have been viewed as desirable settlement locations throughout the prehistoric and historic periods. It is possible that ground disturbances associated with the proposed road development may result in direct, negative

impacts where Areas of Archaeological Potential have been identified (AAPs 1 - 12 (ref. Figures 13.1.01 to 13.1.15 of the EIAR)) and across the remainder of the project, where specific sites have not been identified, but where archaeological remains may be present with no surface expression. Dependant on the nature of any remains present, impacts (prior to the application of mitigation) have the potential to range from moderate to profoundly negative.

- 3.9 A total of 33 townland boundary crossings traversed by the proposed road development have been identified during the assessment.
- 3.10 Once the recommended mitigation measures, as detailed in Section 13.6 of Chapter 13 of the EIAR, have been applied, there will be no residual impact on the archaeological, architectural or cultural heritage resource as a result of the construction of the proposed road development.
- 3.11 For the operational phase of the proposed road development, whilst the proposed mitigation measures will record the current context of those sites that will be indirectly impacted, the measures will not fully remove the residual impact of the proposed road development on the setting of the following sites:
- AH 15/ BH 19 Menlo Castle (ref. Figure 13.1.07 of the EIAR) and AH 16/ BH 10 Summer House (ref. Figure 13.1.09 of the EIAR) – post mitigation, the operation of the proposed road development will have an indirect moderate negative impact on these structures.
- 3.12 The proposed modification to the Parkmore Link Road will have no effect on the archaeological, architectural or cultural heritage assessment results contained in the EIAR document.
- 3.13 The current National University of Ireland (NUI) planning permission application (Ref 19/373) to construct additional playing pitches and the two proposed strategic housing development applications Ob_229 and Ob_469 and S_003 do not change the conclusions of the cumulative impact assessment on archaeological, architectural or cultural heritage contained in the EIAR.

4 Responses to Submissions/Objections

4.1 Overview

- 4.1.1 Of the 296 submissions made to An Bórd Pleanála (ABP) in respect of the N6 Galway City Ring Road (GCRR) Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Motorway Scheme (MS) and Protected Road Scheme (PRS), five include observations relevant to the archaeological, architectural and cultural heritage environment. None of the 17 submissions received in relation to the Request for Further Information Response related to archaeological, architectural and cultural heritage.

The key items raised are listed below and each of the submissions is responded to separately:

- impacts on archaeology (submission/objection Ob_311)
- impacts at Coolough and Menlough (submission/objection Ob_584 and S_074)
- impacts on Menlo Castle (submission/objection S_013)
- the status of recorded monuments (submission/objection Ob_584)
- the historic significance of Leitriff House (submission/objection Ob_298)

4.2 Impacts on Archaeology

Issues raised in Submission/Objection Ob_311

- 4.2.1 Item 9: *“Our client objects to the serious negative impact this proposed road scheme will have on wildlife, whether any considerations was made towards nature conservation in the area, archaeology and the general landscape character of the area, including retention of natural features such as stone walls.”*

Response

- 4.2.2 With regards to the consideration of archaeology, a full assessment of the potential impact on same is given in Chapter 13 of the EIAR. The methodology followed is included in Section 13.2 of that Chapter, along with legislative requirements and relevance guidance documents adhered to in the assessment. The evaluation of impacts of the proposed road development on archaeological, architectural and cultural heritage are described in Section 13.5 and measures are proposed to mitigate these impacts in Section 13.6 of that Chapter.
- 4.2.3 The character of the landscape, including the presence of stone walls, is dealt with by Mr Thomas Burns in his Statement of Evidence, which covers the Landscape and Visual assessment (Chapter 12 of the EIAR). During the compilation of the archaeological, architectural and cultural heritage assessment, as number of stone walls that will be impacted upon were included in the assessment as laid out in Table 13.9 of the EIAR. These include CH 8, 33, 36, 48, 71 and 72. The sections of these walls to be removed will be subject to a full written and photographic record prior to the commencement of construction works.

4.3 Impacts at Coolough and Menlo

Issues raised in Submission/Objection Ob_584

- 4.3.1 Page 4, paragraph 5: *“Coolough Village also has a famine village settlement, with huge potential to become a major tourist attraction.....It is my understanding that it is soon to become a protected structure. There is also a cottage which is listed as a protected structure at the heart of the Colough village. This area is in very close proximity to Lackagh Quarry and will ultimately be damaged due to the proposed construction.”*

- 4.3.2 Page 4, paragraph 7 & 8: *“The Gate House (at Menlo) is located a mere 406m northwest of the proposed road. Many HGVs will have to pass beside it to gain access to the lands for proposed construction. Our local burial ground is only 577m away. The grounds surrounding Menlo Castle should be treated carefully, as they probably contain artifacts of archaeological significance.*

The proposed construction of the road most probably will damage all of these structures.”

Response

- 4.3.3 The protected structure cited in the submission, which is a cottage located at Coolough, is listed within the Galway City Development Plan (2017-2022) as RPS 2402 and is identified as BH 11 in Chapter 13 of the EIAR. There are no other protected structures listed within the study area of the proposed road development at this location. Galway City Council have confirmed that there are no proposals to define Coolough Village as a ‘protected structure’ in the future.
- 4.3.4 The cottage (BH 11) is located 63m northwest of the existing access into Lackagh Quarry, which will also be an access route for a construction site compound during the construction of the proposed road development. The proposed road development itself is located 314m north of the cottage. As per the summary of potential impacts upon the built heritage resource detailed in Table 13.22 of Chapter 13 of the EIAR, the impact at BH 11 as a result of the construction and operation of the proposed road development will be neutral as there will be no change to the setting of the structure or the structure itself.
- 4.3.5 Ms Eileen McCarthy has addressed the observation regarding Menlo Gate House (AH 41/ BH 21) in her Statement of Evidence, within the section detailing with ‘Access during Construction’. No construction traffic will be permitted to pass adjacent to Menlo Gate House. The structure will not be impacted upon by the proposed road development. This is also the case for the recorded burial ground (AH 10), where the impact is deemed to be neutral. The grounds surrounding Menlo Castle, to be impacted upon by the proposed road development will be subject to a programme of archaeological testing in advance of construction, as detailed in section 13.2.6 of Chapter 13 of the EIAR.

4.4 Status of Recorded Monuments

Issues raised in Submission/Objection Ob_584

- 4.4.1 Page 4, paragraph 6: *“I am absolutely shocked to discover from examining the planning documents, to read in Appendix A 13.2 Recorded Monuments within the receiving environment, that a number of the 41 historical sites mentioned are to be downgraded in status. Who decides this? In this day and age where maintaining the environment is of paramount importance at local, national and international levels, its seems very foolish to destroy the little that we have left in such close proximity to Galway City.”*

Response

- 4.4.2 As detailed in Section 13.3.1.2 of Chapter 13 of the EIAR, the existing Record of Monuments is under review by the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht. Of the 41 Archaeological Heritage sites included in the assessment, five are now redundant records as the sites are deemed to be non-archaeological. A further eight sites are proposed for removal due to their recent dates and the fact that post medieval quarry sites are not considered to possess archaeological significance. Four of the sites will be removed from the record as they are no longer extant having been removed by modern development.
- 4.4.3 It is the responsibility of the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht for the maintenance and revision of the Record of Monuments and Places and the Sites and Monument Record.

4.5 Impacts on Menlo Castle

Issues raised in Submission/Objection S_013

- 4.5.1 Item 2: *“The proposed road runs through the curtilage of a National Monument, Menlo Castle, and will irreparably damage the setting of the castle.”*
- 4.5.2 Page 8, paragraph 4: *“The proposed route of the ring road runs directly through the historic demesne and curtilage of Menlo Castle, permanently damaging its iconic setting on the edge of the River Corrib. The EIAR describes the visual impact of the ring road on the castle as ‘profound’. If the recognition of the castle’s status as a National Monument, a Protected Structure and a building of regional architectural and archaeological importance is to mean anything then it must surely protect it against the whole sale destruction of its setting in this manner.”*

Response

- 4.5.3 Menlo Castle is included within the Record of Monuments and Places and is a Protected Structure (AH 16 and BH 10). The castle is not a National Monument. The building is included within the National Inventory of Architectural Heritage survey, but this does not afford the structure any additional protection. The structure is located 140m northwest of the proposed road development. As detailed in Tables 13.17 and 13.18 of Chapter 13 of the EIAR, the operational impact has the potential to result in an indirect significant negative impact upon the castle as an archaeological and built heritage site.
- 4.5.4 It is proposed to record the current setting of the castle as laid out in Section 13.6.3 of Chapter 13 of the EIAR. It is acknowledged in Section 13.7.3 of Chapter 13 of the EIAR, that there will be an indirect moderate negative impact on the castle during the operational phase of the proposed road development.
- 4.5.5 With regards to the post medieval demesne landscape associated with the 18th and 19th century use of the castle – DL 8 - the predicted impact is a direct, significant negative impact. However, the former demesne now exists in a denuded state and

sections have been subject to modern development. Considering the poor state of preservation of the designed landscape, it cannot be considered as representing the full curtilage associated with the protected structure.

4.6 Submission from the Menlo-Ballindooley Residents

Issues raised in Submission/Objection S_074

- 4.6.1 Page 1, paragraph 3: *“Of equal importance is the historical significance of the Sean Bothar, is the fact, that this is the original route Oliver Cromwell’s Army utilised to enter Galway City in the 17th century.”*
- 4.6.2 Page 2, paragraph 3: As a point of information reference is made in the submission to a historic map in Appendix 2 of the submission. This has been annotated as dating to 1820. However, the map, which is a screen shot from the OSI website site, is a copy of the first edition OS map dating to 1841.
- 4.6.3 Page 6, paragraph 2: *“A national monument was destroyed (by previous operators of the quarry): a remarkable example of a ringfort.”*
- 4.6.4 Page 7, paragraph 1: *“As the stones of the previously mentioned ringfort are still on site, is there any legal obligation on the latest owners, and or Galway City Council/National Roads Authority to restore this national monument? Please advise on this matter.”*
- 4.6.5 Page 20, paragraph 1: *“There is also a nearby well adjacent to a protected structure – RPS Ref 3607. Can An Bord Pleanála please clarify the official status re the aforementioned protected structures features ASAP?”*
- 4.6.6 Page 22, paragraph 3: *“There are many other unidentified ancient/historical dwellings and features in the direct path and/or immediately adjacent to the route of the N6, in the Menlough-Coolough area. There is no reference to the dolman at Menlo or the famine mounds in the fields at Ballindooley? There have existed multiple and various historical populations at Menlo-Coolough for millennia: including Palaeolithic and Mesolithic artefacts and relics, Bronze Age and Viking relics and vessels. The local museum and the National Museum will be familiar with the numerous stone axe heads, arrow heads and bronze swords regularly found in these areas. There are numerous unrecorded Caisleáns adjacent to Coolough Quarry and Viking vessels lie in waters just upstream of Menlo. There are Crannogs in the area too. None of the above is considered in the EIAR? We ask that these issues be addressed at Oral Hearing. “*
- 4.6.7 Pages 23-25: *“Within these pages of the submission it is asserted that there is a possible stone chapel, intact unidentified stone structures and a section of the ‘Old Galway City Boundary’ wall, all of which will be affected by ‘tunnelling and blasting’. 4.5.7 Several photographs are presented in the submission of the said structures (pages 23-25). On page 25 it is noted from local knowledge that the hollow cairns pictured were intended to protect vegetables from predators adjacent to a nearby unrecorded famine settlement and were originally capped with thatch.”*

- 4.6.8 Page 25, paragraph 2 goes on to note the following: *“There is also a series of unique triangular fields, possibly famine or pre-famine settlements, with a circular stone structure and rights of way either side of the settlement with another right of way which originates from the meadows, under which a section of the proposed Coolough tunnel will be located. This is not referred to in the EIAR. We ask for a suitable explanation for this at the forthcoming oral hearing.”*

Response

- 4.6.9 With regards to Oliver Cromwell, no direct evidence exists that he and his army used this route. They may have, just as they may have used any routes between the siege zone of Lough Atalia and Lough Corrib. The proposed road development will not lead to the removal of the route, as it will be crossed by the proposed road development.
- 4.6.10 In relation to the quarry and former ringfort, two probable ringforts were formerly located within the quarry and are included within Chapter 13 of the EIAR as archaeological heritage sites, AH 18 and 19. These sites have been completely removed by quarrying and it is proposed to remove them from the RMP as a result. Neither is listed as a National Monument.
- 4.6.11 The stones cited as representing the remains of a ringfort within the quarry cannot be definitively connected to the former monument, as the stones are loose and not in-situ. It is highly unlikely that the stones relate to the former monument, which has been completely removed by quarrying and no longer possesses an in-situ remains. Reconstruction of the monument would not be possible as all information relating to how it may have once looked has been lost including all archaeological contexts.
- 4.6.12 In reference to the protected structure at Coolough, the correct RPS reference is RPS 2402 and it is identified as protected structure BH 11 in Chapter 13 of the EIAR. The only structure cited within the record is the cottage itself.
- 4.6.13 With regards to previously unidentified archaeological sites, a full assessment of the potential impact on same is given Section 13.5 of Chapter 13 of the EIAR and measures are proposed to mitigate these impacts in Section 13.6 of Chapter 13 of the EIAR. The submission references photographs of a number of stone features that appear to represent clearance cairns or small windbreaks, which are included in the submission and connected appendices. No locational detail or mapping has been submitted with this information, so it is not possible to comment on same as the landscape context and relevance to the proposed road development is unknown. The results of the field inspections carried out as part of the assessment for the proposed road development are included in Appendix A.13.6, Detailed field inspection results, of the EIAR.
- 4.6.14 The submission does not provide images or locational detail relating to a dolmen at Menlo. A possible megalithic structure was noted during the course of the EIAR assessment within that townland. It is referenced as CH 49 in Chapter 13 of the EIAR and included in Appendix A.13.1, Archaeological and Historical

background, of the EIAR and Appendix A.13.6, Detailed field inspection results, of the EIAR.

- 4.6.15 Again, the submission does not provide locational details regarding famine mounds or post medieval agricultural features at Ballindooley. No specific previously unrecorded sites were identified within this townland during the field inspection of the proposed scheme or during the baseline compilation.
- 4.6.16 Regarding sites and artefacts from a variety of prehistoric and historic periods, as a point of information that there is no known Palaeolithic archaeology in County Galway. In 2016 a butchered bear bone was dated from a cave from County Clare, which provides a date of around 10,500 BC for the earliest known human activity in Ireland. Appendix A.13.3 of the EIAR details all stray finds recorded from the study area of the proposed road development, which are listed in the National Museum of Ireland Topographical files. These include seven stone axeheads from the River Corrib (near Menlo) along with various lithic artefacts also from the river near Menlo.
- 4.6.17 Unrecorded *Caisleáns*, taken to translate as ‘castle’, in the vicinity of Coolough Quarry are cited in the submission. No evidence for previously unrecorded castles in this area was noted during the course of the compilation of this EIAR. Similarly, there is no recorded evidence for the presence of Viking boats within the Corrib above Menlo.
- 4.6.18 Crannogs are discussed on page three of Appendix A.13.1 of the EIAR. The closest such site is located 360m away from the edge of the proposed road development on the shores of Ballindooley Lough.
- 4.6.19 No locational detail is presented in the submission with regards to possible structures, including the old city wall, a possible chapel and unidentified famine settlement. Therefore, it is very difficult to comment on the context of same. However, I can confirm that this area was fully assessed during the baseline assessment and during the field inspection. Any features of archaeological / cultural heritage merit were identified and included in Chapter 13 of the EIAR. There is no evidence for the presence of an ‘Old City Wall’ in this area – a feature that would be recorded within the Ordnance Survey historic mapping. Similarly, there is no evidence for pre-famine settlements in the area other than Coolough Village. The first edition OS maps, which date to 1841, are detailed in the recording of structures. Whilst it is possible that the surrounding fields were used for agriculture during this time, this is no different from any other 19th century landscape found in Ireland.

4.7 Submission from Tony O’Hanlon & Peggy McConnell

Issues raised in Submission/Objection Ob_298

- 4.7.1 Page 7, paragraph 2: “*Figure 13.1.06 of the EIAR refers to our client’s property ‘Leitriff House’ as a cultural heritage site/ structure of archaeological or built heritage potential under Ref.: CH 35.*”

Response

- 4.7.2 I can confirm that Leitriff House has been identified as a structure possessing architectural heritage merit during the compilation of Chapter 13 of the EIAR. It is listed as CH 35 in Table 13.9 within Chapter 13 and described further on page 7 (paragraph 5) in Appendix A.13.6, Detailed Field Inspection Results.

5 Conclusion

- 5.1 In summary, I can conclude that a detailed assessment of the archaeological, architectural and cultural heritage resource has been carried out as part of the proposed road development. This has included a thorough analysis of baseline data, along with field inspections and one area of geophysical survey, which was carried out at a site of archaeological potential. A full assessment of the potential impacts has been carried out, which is accompanied by a suite of mitigations measures that are designed to reduce or completely remove any negative impacts upon the archaeological, architectural and cultural heritage resource.
- 5.2 In these circumstances, having addressed the issues raised in submissions and observations made to the Board, the proposed road development will not result in any significant impacts upon the archaeological, architectural and / or cultural heritage resource. Items raised in the relevant submissions and observations have not affected the results of the archaeological, architectural and cultural heritage assessment.